

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

BRITTNEY MCDOUGLE, INDIVIDUALLY, AND  
ON BEHALF OF THE HEIRS  
AND WRONGFUL DEATH BENEFICIARIES  
OF MICHAEL D. MCDOUGLE, SR., DECEASED

PLAINTIFF

VS.

CIVIL ACTION NO. 3:15-cv-00350-CWR-FKB

NESHoba COUNTY, MISSISSIPPI, ET AL.

DEFENDANTS

**AFFIDAVIT OF SCOTT CUNNINGHAM**

1. My name is Scott Cunningham. I am a resident of Mississippi and reside in Meridian, Mississippi. I am above the age of 21 and have knowledge of the facts set forth in this affidavit.

2. On November 1, 2014, I was incarcerated at the Neshoba County Jail and worked as a trusty.

3. I was in the hallway next to the booking area of the jail when the police officers carried Michael "Lolo" McDougle from the sallyport door to the isolation cell.

4. A short time later, EMTs evaluated McDougle in his cell. It appeared that they thought McDougle was fine, and they did not take him to the hospital.

5. I never heard the EMTs or any of the officers at the jail state that McDougle needed additional medical attention.

6. I never heard McDougle make any statements regarding his medical condition.

7. I never heard McDougle ask for help or any additional medical treatment.

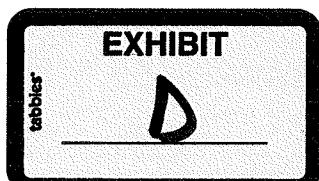
8. *Dez M. Williams come to the trusty grounds & told me he took*  
*I saw officers take McDougle water on at least one occasion whenever he asked.*

for it.

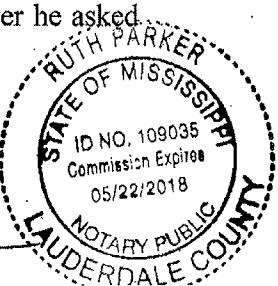
{D0624352.1}

*Kenneth Scott Cunningham*

9-7-16



*Ruth Parker*  
Ruth Parker  
05/22/2018



9. I did not speak with any of the jail officers that night about Mr. McDougle or his condition.

10. I am not aware of any officer, jailer, or anyone else ever hitting, punching, beating, striking, or engaging in any other form of violence or mistreatment toward McDougle while he was at the jail. I also am not aware of anyone using a taser on McDougle while he was at the jail.

11. I never went inside McDougle's cell while he was at the jail. I also did not go into his cell on the morning of November 2, 2014, after McDougle was removed from the jail.

Further Affiant saith not.

*Kenneth Scott Cunningham*  
SCOTT CUNNINGHAM

SWORN TO AND SUBSCRIBED BEFORE ME, this the 7 day of September, 2016.

*Ruth Parker*  
NOTARY PUBLIC

My commission expires:

05-22-18

